

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

MARLON BARRIOS and ANGEL MORALES individually and on behalf of all other persons similarly situated who were employed by SUBURBAN DISPOSAL INC., LOUIS T. ROSELLE, INC., CHRISTOPHER ROSELLE, DANIEL J. ROSELLE, and LOUIS ROSELLE, and/or any other entities affiliated with or controlled by SUBURBAN DISPOSAL INC., LOUIS T. ROSELLE, INC., CHRISTOPHER ROSELLE, DANIEL J. ROSELLE, and LOUIS ROSELLE,

No. 12-cv-03663 WJM-MF

NOTICE OF MOTION

Plaintiffs,
-against-

SUBURBAN DISPOSAL INC., LOUIS T. ROSELLE, INC., CHRISTOPHER ROSELLE, DANIEL J. ROSELLE, and LOUIS ROSELLE, and/or any other entities affiliated with or controlled by SUBURBAN DISPOSAL INC., LOUIS T. ROSELLE, INC., CHRISTOPHER ROSELLE, DANIEL J. ROSELLE, and LOUIS ROSELLE,

Defendants.

PLEASE TAKE NOTICE that upon the annexed Declaration of Lloyd R. Ambinder, sworn to on January 6, 2016, and all exhibits attached thereto, along with the memorandum of law in support, the undersigned will respectfully move this Court, at the United States Courthouse for the District of New Jersey, located at 50 Walnut Street, Newark, NJ 07101, before the Honorable Mark Falk, for Plaintiffs' unopposed motion for an Order to (1) approve the settlement as fair, reasonable, and adequate for both Rule 23 Class Members and FLSA Collective Members, (2) bind all Rule 23 Class Members who have not timely opted out to the Released State Law Claims as set forth in the Stipulation, (3) award Class Counsel attorneys' fees and costs in the amount equal to \$300,000.00, (4) award services awards to Named Plaintiffs

Marlon Barrios and Angel Morales in an amount equal to \$7,500.00 each (\$15,000 total), and (5) dismiss the Litigation with prejudice.

Dated: New York, New York
January 6, 2016

Respectfully submitted,

VIRGINIA & AMBINDER, LLP

/s/ Lloyd R. Ambinder, Esq.

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